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Approaches to transnational industrial relations history¹

ABSTRACT

Inspired by the “transnational turn” in history writing, this essay reviews recent scholarship dealing with industrial relations from a transnational perspective. The essay starts with conceptual reflections on the merits and potential pitfalls of a transnational approach, and suggests that such an approach should include not only the study of actors, networks and processes at the transnational level (top down perspective), but also that of the impact of transnational factors on industrial relations in specific countries and locations (bottom up perspective). The main part of the essay critically reviews the available scholarship with regard to this two-pronged agenda and makes suggestions for future research.

Over the last decade, transnational approaches have come into fashion among historians in general,² and among labour historians in particular. Conferences and publications on “transnationalism” abound,³ while leading scholars in the field have elaborated ambitious research agendas for what is alternatively labelled as “transnational” or “global” labour history.⁴

- 1 This is an updated version of my article *Industrial Relations History in Transnational Perspective. A Review Essay*, in: *History Compass* (2011), pp. 1–14. I would like to thank the participants of the research seminar at the Institute for Social Movements in Bochum for critical comments and suggestions.
- 2 For the “flagship” of the literature see Akira Iriye/Pierre-Yves Saunier (eds.): *The Palgrave Dictionary of Transnational History*, Basingstoke 2009.
- 3 For recent overviews of the literature see Neville Kirk/Donald MacRaild/Melanie Nolan: Introduction. *Transnational Ideas, Activities and Organizations in Labour History 1860s to 1920s*, in: *Labour History Review* 74:3 (2009), pp. 221–232; Melanie Nolan/Donald MacRaild/Neville Kirk: *Transnational Labour in the Age of Globalization*, in: *Labour History Review* 75:1 (2010), pp. 8–19.
- 4 See Marcel van der Linden: *Transnational Labour History. Explorations*, Aldershot 2003; id.: *Workers of the World. Essays towards a global labour history*, Leiden 2008.

In this essay, I review a sub-field of this literature, namely the scholarship that addresses industrial relations from a transnational perspective.⁵ The essay starts with conceptual reflections on the merits and pitfalls of a transnational approach to industrial relations. I argue that a transnational approach should not be confined to the study of actors and networks at the transnational level, but should also address the impact of transnational factors on industrial relations in specific countries and locations. Sections two and three critically review the available literature with regard to this twofold line of inquiry. Due to space limitation, the discussion of transnational entanglements at the country level is confined to the cases of post-1945 Britain and Germany. I conclude that the current state of the art is characterised by a disjuncture – while the study of transnational networks and organisations has made rapid progress in recent years, these analyses have often remained detached from “mainstream” national industrial relations historiography. In the future, as Trentmann argued already in 1997 in relation to labour parties and trade unions, more efforts are needed “to treat domestic and international thought and policy as interlocking spheres.”⁶

Transnational history: Conceptual reflections

It can not be the purpose of this essay to provide an exhaustive overview of the ongoing conceptual debates about transnational history writing, and the related discussion about the delimitation between “transnational”, “international” and “global” approaches.⁷ A few preliminary conceptual reflections are in order, however, as they help to clarify the assumptions that underpin the subsequent empirical assessment of the industrial relations literature.

Most scholars in the new field of transnational history share a common point of departure, namely their dissatisfaction with what is often referred to as “methodological nationalism”, that is, past historians’ alleged tendency to treat national societies as “natural” spatial units, and to conceive of them as nomadic “containers” whose interactions

- 5 Industrial relations are understood as the system of relationships between employees, trade unions, employers and the state concerned with the rules pertaining to labour aspects of production – see Jonathan Zeitlin: From labour history to the history of industrial relations, in: *Economic History Review* 40:2 (1987), pp. 159–184, p. 159.
- 6 Frank Trentmann: Wealth versus Welfare. The British Left between Free Trade and National Political Economy before the First World War, in: *Historical Research* 70 (1997), pp. 70–89, p. 97.
- 7 See Patricia Clavin: Defining Transnationalism, in: *Contemporary European History* 14 (2005), pp. 421–439; Klaus Kiran Patel: Transnationale Geschichte – ein neues Paradigma? In: *H-Soz-U-Kult*, 2 February 2005, <http://hsozkult.geschichte.hu-berlin.de/forum/id=573&type=diskussionen> (Abruf am 15. April 2013).

with the outside world were of secondary importance.⁸ There was an urge to problematise national categories, while the *spatial turn* in the social sciences spurred historians to question the boundaries of national “space” and to inquire into shifting notions of “territoriality”.⁹

Against this backdrop, most transnational history writing has to this date focused on all the phenomena that “transcend” national societies. There has been a strong emphasis on *flows* in general, and on the cross-border movement of people in particular – witness the prominence of migration issues in the transnational history debate.¹⁰ Moreover, a great deal of work has been dedicated to the study of transnational networks and institutions – from the scholarship on global institutions like the League of Nations and the United Nations, to the literature about international non-governmental organisations (NGOs), cross-border political, economic and religious networks, and the “epistemic communities” of experts.¹¹

While the growth of scholarship dealing with transnational history along these premises has been impressive over the last decade, a number of scholars have also warned against an excessive and exclusive focus on cross-border flows and networks, and the associated occasional tendency among transnational historians to perceive their approach as a radical new paradigm that cuts all connections with “traditional” historiography.¹² I would like to argue that these critiques need to be taken on board for a transnational history of industrial relations, too.

To start with, as Kiran Patel reminds us, a radical decoupling from “traditional” approaches runs the risk of an implicit normative agenda that associates transnational history by definition with utopian ideals of cosmopolitanism and a peaceful “world society”.¹³ Tellingly, scholars frequently use the term “transnationalism” rather than more “neutral” categories like “transnationality” or “transnationalisation”.¹⁴ This is problematic, not least because it implies a dangerous teleological understanding of transnational

8 For the broader social science debate, see Daniel Chernilo: *Social Theory’s Methodological Nationalism. Myth and Reality*, in: *European Journal of Social Theory* 9:1 (2006), pp. 5–22.

9 See Charles Maier: *Consigning the Twentieth Century to History. Alternative Narratives for the Modern Era*, *American Historical Review* 105 (2000), pp. 807–831.

10 See Steven Vertovec: *Conceiving and Researching Transnationalism*, in: *Ethnic and Racial Studies* 22:2 (1999), pp. 447–462.

11 See for example J. Boli./G.M. Thomas: *Constructing World Culture. International Nongovernmental Organizations since 1875*, Stanford 1999.

12 See Jürgen Osterhammel: *Transnationale Gesellschaftsgeschichte. Erweiterung oder Alternative?*, in: *Geschichte und Gesellschaft* 27 (2001), pp. 464–479.

13 Patel: *Transnationale Geschichte – ein neues Paradigma?*

14 See for example Clavin, pp. 421–439; Vertovec, pp. 447–462.

history and tends to restrict the scope of inquiry – at the extreme, the cross-border cooperation of criminals and racists is part of transnational history, too.¹⁵

A second (and in part related) problem is that the radical urge to overcome “methodological nationalism” at times culminates in the understanding of transnational history as “post-national” history and an associated rigid demarcation from “traditional” international history. While the precise relationship between transnational and international history is debatable, much militates against a clear-cut demarcation.¹⁶ More importantly, a growing body of scholarship emphasises that it is altogether mistaken to conceptualise the relationship between the “national” and the “international/transnational” spheres in a dichotomous, zero-sum way. Such a view fails to acknowledge that the principle of nationality has crucially informed *inter-national* relations since the nineteenth century while, at the same time, transnational factors have continuously shaped and reshaped nationally defined cultures and practices.¹⁷ Indeed, even nationalism itself may in part have persisted because of, rather than despite internationalisation processes. For example, such processes may heighten concerns for the protection of national culture and tradition¹⁸, but they may also provide new opportunities for nation branding as a sales strategy on world markets.¹⁹ International tourism, rather than de-territorialising hosts and guests alike, may in fact contribute to the *re-imagining* of national history, memory and material culture.²⁰ Consequently, as aptly put by Sebastian Conrad, the issue is not so much to get rid of national categories altogether but to provide a better understanding of the ways in which these categories are themselves shaped by cross-border entanglements.²¹

The methodological upshot of these reflections is that transnational history should be understood as a complement rather than a radical anti-thesis to ‘traditional’ national

15 Patel: *Transnationale Geschichte – ein neues Paradigma?*

16 *Ibid.*, pp. 2, 5 f.

17 See James Mayall: *Nationalism and International Society*, Cambridge 1990; Martin H. Geyer/Johannes Paulmann (eds.): *The Mechanics of Internationalism. Culture, Society and Politics from the 1840s to the First World War*, Oxford 2001.

18 See Patricia M. Goff: *It’s got to Be Sheep’s Milk or Nothing! Geography, Identity, and Economic Nationalism*, in: Eric Helleiner/Andreas Pickel (eds.): *Economic Nationalism in a Globalizing World*, Ithaca 2005, pp. 183–201.

19 See Oliver Kühschelm: *Konsumgüter und Nation: Theoretische und methodische Überlegungen*, in: *Österreichische Zeitschrift für Geschichtswissenschaften* 21:2 (2010), pp. 19–49.

20 Erik Zuelow: *Identity and tourism in 20th century Ireland. The role of collective re-imagining*, in: Michelle Young et al. (eds.): *Nationalism in a global era. The persistence of nations*, London/New York 2007, pp. 156–176.

21 Sebastian Conrad: *La constitution de l’histoire japonaise. Histoire comparée, transferts, interactions transnationale*, in: Michael Werner/Bénédicte Zimmermann (eds.): *De la comparaison à l’histoire croisée*, Paris 2004, pp. 55 f.

historiography.²² First, from a top-down perspective, the analysis of transnational phenomena should include systematic attention to their relationship to the national sphere. How, on the one hand, did national structures and actors shape the development of transnational flows and networks? And how, on the other hand, did these flows and networks impact upon domestic patterns and practices?

Second, from a bottom-up perspective, transnational history faces the challenge to relate cross-border entanglements to the analysis of place-specific processes of change. At its best, the “added value” of such transnational histories is not confined to a cumulative widening of perspectives, but implies the attempt to critically engage with existing narratives of national historiography – as illustrated, for example, in Conrad’s and Trentmann’s transnational approach to the history of nationalism in Germany and Britain in the late nineteenth and early twentieth centuries.²³

Adopting the distinction between top-down and bottom-up perspectives as a structuring device, the remainder of this essay will now turn to the review of the existing transnational industrial relations literature.

Transnational industrial relations from a top-down perspective

The study of industrial relations-related transnational networks and organisations has made rapid progress during the last two decades. This is perhaps best expressed in the proliferating scholarly work on the International Labour Organization (ILO).²⁴ Founded in 1919 under the auspices of the League of Nations with a unique tripartite decision-making structure (government, employer and trade union representatives), the ILO is often considered as the key organisation in attempts to promote a “global social order” – by the early 21st century it had adopted about 180 international conventions on work-related issues.

The ILO’s history started to spark professional academic interest since the late 1950s – by lawyers, political scientists and historians alike.²⁵ But it is since the 1990s that we have witnessed a breakthrough towards a multi-faceted and sophisticated ILO historiography. Not only has the ILO’s institutional history been more systematically explored than

22 Osterhammel, pp. 464–479.

23 See Frank Trentmann: *Free Trade Nation. Consumption, Commerce and Civil Society in Modern Britain*, Oxford 2008; Sebastian Conrad: *Globalisierung und Nation im deutschen Kaiserreich*, München 2006.

24 For an overview see Jasmien van Daele: *The International Labour Organization (ILO) in Past and Present Research*, in: *International Review of Social History* 53:3 (2008), pp. 485–511.

25 See for example: B. Beguin: *The ILO and the Tripartite System*, New York 1959; V. Coussirat-Coustere: *Les origines et la naissance de l’Organisation internationale du Travail*, Paris 1970; Robert Cox: *Labor and Hegemony*, in: *International Organization* 31:1 (1977), pp. 385–424.

before.²⁶ More importantly, recent scholarship has branched out in many directions to address specific issues of the ILO's activities – from its involvement in the struggles against child and forced labour,²⁷ to the promotion of gender equality²⁸ and the intellectual construction of social security regimes.²⁹ Earlier biographical works on prominent ILO officials like Albert Thomas have been supplemented by new publications.³⁰

ILO historiography is also exemplary in its attention to the interaction between transnational and national spheres. Already in the 1960s and 1970s, a number of studies had scrutinised the ILO's relationship with specific member-states, in particular with regard to the Cold War superpowers.³¹ Since the 1990s, this line of research has been extended considerably even if a Western bias remains³² – ILO experts see closer attention to development issues and a broader involvement of historians from developing countries as one of the crucial future challenges.³³ It might be added that the strong recent emphasis

- 26 See Jasmien Van Daele et. al. (eds.): *ILO Histories. Essays on the International Labour Organization and Its Impact on the World During the Twentieth Century*, Bern 2010.
- 27 Marianne Dahlen: *The Negotiable Child. The ILO Child Labour Campaign 1919–1973*, Uppsala 2007; Daniel Maul: *The International Labour Organization and the Struggle against Forced Labour from 1919 to the Present*, in: *Labor History* 48:4 (2007), pp. 477–500; Sandrine Kott: *Arbeit. Ein transnationales Objekt? Die Frage der Zwangsarbeit im 'Jahrzehnt der Menschenrechte'*, in: Christina Benninghaus et al. (eds.): *Unterwegs in Europa. Beiträge zu einer pluralen europäischen Geschichte*, Frankfurt a. M. 2008.
- 28 Carol Riegelman Lubin/Anne Winslow: *Social Justice for Women. The International Labor Organization and Women*, Durham 1990; Nitza Berkovitch: *From Motherhood to Citizenship. Women's Rights and International Organizations*, Baltimore 1999.
- 29 Cedric Guinand: *Die Internationale Arbeitsorganisation (ILO) und die soziale Sicherheit in Europa (1942–1969)*, Bern 2003.
- 30 Martin Fine: *Albert Thomas. A Reformer's Vision of Modernization*, in: *Journal of Contemporary History* 12 (1977), pp. 545–564; Denis Guerin: *Albert Thomas au BIT. De l'internationalisme à l'Europe*, Geneva 1996.
- 31 Robert I. Hislop: *The United States and the Soviet Union in the ILO*, Ann Arbor 1961; Harold K. Jacobson: *The USSR and the ILO*, in: *International Organization* 14:3 (1960), pp. 402–428.
- 32 Keith Ewing: *Britain and the ILO*, London 1994; Halldor Heldal: *Norway in the International Labour Organization (1919–1939)*, in: *Scandinavian Journal of History* 21:4 (1996), pp. 255–283; Josefina Cuesta Bustillo: *Una esperanza para los trabajadores. Las relaciones entre España y la Organización Internacional del Trabajo (1919–1939)*, Madrid 1994; Stephen Hughes: *New Zealand and the ILO. Current Debates and Future Direction*, Auckland 1995; Klara Boonstra: *The International Labour Organization and the Netherlands. Different Views concerning Government Influence on the Relationship between Workers and Employers*, Leiden 1996.
- 33 Van Daele, *The International Labour Organization*, p. 509.

on transnationally networked ideas occasionally runs the risk to assume (rather than demonstrate) the ILO's impact on national labour regulation.³⁴

From a narrower European perspective, perhaps surprisingly, the impressive growth of research on the ILO has not yet been matched by equivalent efforts to deal with European Community/European Union (EC/EU) industrial relations regulation. There are a number of more broadly designed studies on the evolution of supranational European social policy, which occasionally include a specific emphasis on the origins of EC social dialogue.³⁵ But there is yet no comprehensive treatment of the historical development of EC/EU industrial relations agendas – from the promotion of equal pay between men and women, to supranational legislation on health and safety, training and employee consultation.³⁶ More focused studies, for example with regard to the decade-long debate about EC/EU legislation on worker participation, have so far equally remained the domain of legal and political science scholars.³⁷

In a number of cases, transnational regulatory attempts have included more than a single arena. International labour standards, for example, have not only been promoted by the ILO, as their possible incorporation into the world trade regime has repeatedly been discussed within the GATT and WTO frameworks as well.³⁸ Moreover, since the 1960s, the labour standards issue has also been part of the transnational fair trade initiatives, which sought to generate transnational consumer pressure on multinational firms to change labour practices in developing countries.³⁹ Attempts to regulate industrial relations in multinational firms have been undertaken in a variety of arenas as well, from

34 See for example: Daniel Maul: *Der transnationale Blick. Die Internationale Arbeitsorganisation und die sozialpolitischen Krisen Europas im 20. Jahrhundert*, in: *Archiv für Sozialgeschichte* 47 (2007), pp. 349–367.

35 See Antonio Varosi/Laura Leonardi: *Lo spazio sociale europeo. Atti del convegno internazionale di studi Fiesole (Firenze). 10–11 ottobre 2003*, Florence 2005; Maria Eleonora Guasconi: *Paving the way for a European social dialogue. Italy, the trade unions and the shaping of a European social policy after the Hague conference of 1969*, in: *Journal of European Integration History* 9:1 (2003), pp. 87–110.

36 For a contemporary synthesis see Paul Marginson/Keith Sisson: *European Integration and Industrial Relations. Multi-Level Governance in the Making*, London 2004.

37 See for example Armin Höland: *Mitbestimmung in Europa. Rechtliche und politische Regelungen*, Frankfurt/New York 2000.

38 See Edward C. Lorenz: *Defining Global Justice. The History of US International Labor Standards Policy*, Notre Dame 2001.

39 See Gavin Fridell: *The Fair Trade Network in Historical Perspective*, in: *Canadian Journal of Development Studies* 25:3 (2004), pp. 411–428; Matthew Anderson: *Cost of a Cup of Tea. Fair Trade and the British Cooperative Movement. 1960–2000*, in: Lawrence Black/Nicole Robertson (eds.): *Consumerism and the Co-operative Movement in Modern British History. Taking Stock*, Manchester 2009.

ILO to the Organisation for Economic Co-operation and Development (OECD) and the European Community/Union.⁴⁰ Again, this is a field that has so far been dominated by political scientists and that merits closer scrutiny from labour historians.⁴¹

If we shift the focus from institutional arenas to actors, the recent upsurge in the study of transnational trade union organisations is particularly noteworthy. Certainly, this topic had attracted some interest already prior to the 1990s, yet the last two decades witnessed a quantum leap forward. We now have a whole range of good overviews of the institutional evolution and the activities of international trade union organisations – whether Catholic, Social Democratic or Communist, whether at the level of umbrella confederations or in individual sectors, whether global or regional (European) in scope.⁴² More focused studies include international union organisations' involvement in Cold War conflicts,⁴³ their role in the International Labour Organization,⁴⁴ and their attempts to lobby for global and/or regional regulatory codes for multinational firms.⁴⁵ The specific case of union-driven transnational bargaining in the maritime industry has attracted particularly strong interest.⁴⁶ If a major gap persists, it is the missing local

40 John Robinson: *Multinationals and Political Control*, Aldershot 1983; Torsten Müller/Hans-Wolfgang Platzer/Stefan Rüb: *Transnational Industrial Relations in Global Companies*, Düsseldorf 2004.

41 Van Daele, *The International Labour Organization*, p. 509.

42 See Marcel van der Linden et. al. (ed.): *The International confederation of free trade unions*, Bern 2000; Patrick Pasture: *Histoire du syndicalisme chrétien international. La difficile recherche d'une troisième voie*, Paris/Montreal 1999; Peter Rütters: *History of the IUF*, Bonn 2003; Werner Reutter: *Möglichkeiten und Grenzen internationaler Gewerkschaftspolitik*, Frankfurt 1998; Sigrid Koch-Baumgarten: *Gewerkschaftsinternationalismus und die Herausforderung der Globalisierung. Das Beispiel der Internationalen Transportarbeiterföderation (ITF)*, Frankfurt a.M. 1999; Corinne Gobin: *Consultation et concertation sociales à l'échelle de la Communauté économique européenne. Etude des positions et stratégies de la Confédération européenne des syndicats (1958–1991)*, Brussels 1996; Barbara Barnouin: *The European Labour Movement and European Integration*, London 1986; Jan-Erik Dolvik: *An Emerging Island? ETUC, Social Dialogue, and the Europeanization of the Trade Unions in the 1990s*, Brussels 1999.

43 See Dennis MacShane: *International Labor and the Origins of the Cold War*, Oxford 1992.

44 See Reiner Tosstorff: *The International Trade Union Movement and the Founding of the International Labour Organization*, in: *International Review of Social History* 50:3 (2005), pp. 399–433.

45 See Rebecca Gumbrell-McCormick: *Facing New Challenges. The International Confederation of Free Trade Unions 1972–1990s*, in: Van der Linden, *The International Confederation of Free Trade Unions*, pp. 341–517.

46 See Koch-Baumgarten; Bob Reinalda (ed.): *The International Transportworkers Federation 1914–1945. The Edo Fimmen era*, Amsterdam 1997.

studies of cross-border cooperation in multinational firms.⁴⁷ Moreover, unfortunately, the literature on international trade unionism at times suffers from the above mentioned normative bias, expressed in teleological notions of the “necessity” to step up cooperation efforts. Van der Linden, for example, portrays the period since the 1960s as a “prolonged transitional phase”, which is “projected” to end with the replacement of (limited) “national internationalism” (dominated by high-level diplomacy between national union bureaucracies) by a new network-based and grassroots “transnational internationalism”.⁴⁸

Compared to the rich trade union literature, other actors have received far less scholarly attention. This is particularly discernible in the case of employer organisations – except for a few insider accounts, there is yet no serious academic analysis of the main international employer confederation, the International Organization of Employers.⁴⁹ At the regional European level, there are already several studies of the EU/EC-level peak employer organisation, the Union of Industrial and Employers’ Confederation of Europe (later renamed BusinessEurope), as well as of more informal groupings such as the European League for Economic Cooperation and the European Roundtable of Industrialists.⁵⁰ Moreover, there is also a sizeable literature in relation to European employer

47 For a single case study see Thomas Fetzer: *The Late Birth of international labour cooperation. Cross-border trade union networks at Ford and General Motors 1953–2001*, in: *Labour History Review* 75:1 (2010): pp. 76–97; for the industrial relations debate on cooperation in multinational firms see for example Herbert R. Northrup/Richard L. Rowan: *Multinational Collective Bargaining Attempts. The Record, the Cases, and the Prospects*, Philadelphia 1979; Ernst Piehl: *Multinationale Konzerne und internationale Gewerkschaftsbewegung. Ein Beitrag zur Analyse und zur Strategie der Arbeiterbewegung im international organisierten Kapitalismus insbesondere in Westeuropa*, Nördlingen 1973; for the more recent period see Müller/Platzer/Rüb, *Transnational Industrial Relations*; and, with a regional focus on Europe, Michael Whittall/Herman Knudsen/Fred Huijgen (eds): *Towards a European Labour Identity. The case of the European Works Council*, London 2007.

48 Marcel van der Linden: *Workers of the World. Essays towards a global labour history*, Leiden 2008, pp. 278–282.

49 See van Daele, *The International Labour Organization*, p. 510.

50 See Miroslaw Matyja: *Der Einfluss der Vereinigung der Industrie- und Arbeitgeberverbände Europas (UNICE) auf den Entscheidungsprozess der EU*, Bern 1999; Helen Callaghan: *Transnational employer lobbying. When one size does not fit all. Anglo-German wrangles under the UNICE umbrella 1970–2003*, EUI Working Paper, Florence 2007; Michel Dumoulin/Anne-Marie Dutrieue: *La Ligue Européenne de Coopération économique (1946–1981). Un groupe d’étude et de la pression dans la construction européenne*, Bern 1993; Bastian van Apeldoorn: *Transnational Class Agency and European Governance. The Case of the European Round Table of Industrialists*, in: *New Political Economy* 5:2 (2000), pp. 157–181.

networks in specific sectors.⁵¹ However, industrial relations issues have so far not been systematically explored in this literature.

It is also worth pointing to the need for further work on transnational industrial relations expert networks, such as labour economists and lawyers, organisational psychologists or industrial sociologists. There are already a number of good studies about such expert circles in relation to the activities of the ILO,⁵² yet more could be done with regard to the involvement of expert networks in issue-specific debates, for example with regard to the long international discussion about “industrial democracy”.⁵³

Aside from these analyses of transnational regulatory arenas and actor networks, a third and final group of “top-down” studies takes a thematic approach. Here, transnationality is explored in a more diffuse way, as scholars seek to uncover the ways in which industrial relations processes in different locations are connected through cross-border flows of goods, capital, people and ideas.

On the one hand, scholars have conceptualised cross-border flows of goods, capital and workers as constituting transnational labour markets,⁵⁴ and have sought to trace the impact of specific flows on industrial relations processes and outcomes. Historical migration research has demonstrated that the large-scale outflow of workers often had significant effects on wage levels both in the sending and receiving country,⁵⁵ while Beverly Silver’s *Forces of Labour* convincingly points to the impact of global commodity and capital movements on worker bargaining power and strikes.⁵⁶ There are also interesting studies on the impact of cross-border flows in concrete bargaining situations, e. g. with regard to employer tactics to “import” foreign strikebreakers.⁵⁷ This is a fascinating new

51 See for example the contributions in: Eric Bussière/Michel Dumoulin: *Milieux économiques et intégration européenne en Europe occidentale au XXe siècle*, Arras 1998.

52 See for example Sandrine Kott: *Une communauté épistémique du social? Experts de l’OIT et internationalisation des politiques sociales dans l’entre-deux-guerre*, in: *Geneses. Science sociale et histoire* 71 (2008), pp. 26–46; Thomas Cayet: *Organiser le travail, Organiser le monde. Etude d’un milieu international d’organismes-rationalisateurs durant l’entre-deux-guerre*, (unpublished doctoral dissertation, European University Institute), Florence 2005.

53 See for an introduction: Steven Deutsch: *A Researcher’s Guide to Worker Participation. Labor and Economic and Industrial Democracy*, in: *Economic and Industrial Democracy* 26 (2005), pp. 645–656.

54 See Michael Hanagan/Marcel van der Linden: *New Approaches to Global Labor History*, in: *International Labor and Working Class History* 66 (October 2004), pp. 1–11.

55 See for example Timothy J. Hatton/Jeffrey G. Williamson (eds.): *Migration and the International Labor Market*, London 1994.

56 Beverly Silver: *Forces of Labor. Workers’ Movements and Globalization since 1870*, Cambridge 2003.

57 Christian Koller: *Local Strikes as Transnational Events. Migration, Donations, and Organizational Cooperation in the Context of Strikes in Switzerland (1860–1914)*, in: *Labour History*

area of research, which will hopefully be further developed in the future. In this respect, labour historians should be encouraged to engage more seriously with new sociological concepts such as the “commodity chain”.⁵⁸

On the other hand, and equally fascinating, scholars have sought to reconstruct the cross-border transfer of ideas and practices. In many cases, this is in fact connected to the flows of goods, capital and people. Migrants, for example, have not only had effects on host country labour markets, but have also frequently inspired new forms of collective action and trade unionism.⁵⁹ Likewise, cross-border investment flows by multinational firms have been associated with the transfer of labour management practices – despite the fact that such transfers have usually been constrained by firms’ needs to adapt to regulatory institutions in host countries. There is a large social science literature on this subject – in particular related to the experience of US-owned firms – with which historians have only just started to engage.⁶⁰

There are of course also many cases in which transnational transfers of ideas and practices are not directly connected to economic cross-border flows but are mediated through various channels of communication. Collective worker protests, for example, have repeatedly spread to other countries by means of media and/or trade union reporting.⁶¹ Labour management practices have likewise been propagated across borders: the post-1945 European “import” of US-style “productivity bargaining”, for example, was the result of a multitude of transatlantic encounters – from the Organization for European Economic Cooperation and the “productivity councils” associated with the implementation of Marshall Plan aid, to bilateral employer and trade union meetings.⁶² It is not difficult to think about possible other topics to extend this line of research – from the recent spread of Human Resource Management, to cross-border transfers of worker participation schemes.

Review 74:3 (2009), pp. 305–318.

58 Van der Linden, *Workers of the World*, p. 374.

59 For examples see *ibid.* pp. 374f.

60 For recent overviews see Tony Edwards/Anthony Ferner: *The renewed American Challenge. A review of employment practices in US multinationals*, in: *Industrial Relations Journal* 22 (2002), pp. 94–111; Phil Almond/Anthony Ferner (eds.): *American Multinationals in Europe. Managing Employment Relations across National Borders*, Oxford 2006; for a recent historical engagement see William Know/Alan McKinlay (eds.): *American corporations and European labor*, Special Issue, in: *Labor History* 51:2 (2010), pp. 167–344.

61 For examples see Van der Linden, *Workers of the World*, pp. 375f.

62 For the broader context see Marie-Laure Djelic: *Exporting the American model. The post-war transformation of European business*, Oxford 1998.

Transnational industrial relations from a bottom-up perspective: The cases of post-1945 Germany and Britain

Gaps and shortcomings notwithstanding, transnational industrial relations historiography from a “top-down” perspective has made impressive progress over the last two decades. However, unfortunately, this is not matched by similar transnational advances in local and national industrial relations studies. In the following, I will use the cases of post-1945 Britain and Germany to illustrate this disjuncture and to make suggestions to better address this problem in the future.

The underdeveloped transnational dimension of British and German post-1945 industrial relations historiography is easily discernible if we take a look at standard reference works. In the case of trade unions, for example, transnational issues were virtually absent in such works in both countries until a few years ago.⁶³ Indeed, still today, the analysis of transnational issues is usually still confined to an “addendum” related to the period since the late 1980s.⁶⁴

Beyond synthetic overviews, there is of course a more specialised literature dealing with some transnational aspects of post-1945 British and German industrial relations. For example, there is a body of scholarship on British and German trade union politics towards cross-border labour migration.⁶⁵ Likewise, we have a quite rich scholarship in relation to trade union attitudes towards European integration. In the UK, this subject had attracted attention already in the 1970s and 1980s, not least because of the prominence of trade union voices in the heated debates about British EC membership during the 1975 referendum.⁶⁶ German trade union historians neglected the issue for

63 For Germany see for example Hans-Otto Hemmer/Kurt Thomas Schmitz (eds.): *Geschichte der Gewerkschaften in der Bundesrepublik Deutschland. Von den Anfängen bis heute*, Köln 1990; Michael Schneider: *Kleine Geschichte der Gewerkschaften. Ihre Entwicklung in Deutschland von den Anfängen bis heute*, Bonn 2000, chapters 11–14; for Britain: Alan Campbell/Nina Fishman/John McLroy (eds.): *British trade unions and industrial politics*, Aldershot 1999; Chris Wrigley: *British Trade Unions since 1933*, Cambridge 2002.

64 For Germany see Wolfgang Schroeder/Bernhard Wessels (eds.): *Die Gewerkschaften in Politik und Gesellschaft der Bundesrepublik Deutschland. Ein Handbuch*, Wiesbaden 2003.

65 See for example: Peter Kühne: *The Federal Republic of Germany. Ambivalent Promotion of Immigrants Interests*, in: Rinus Penninx/Judith Roosblad (eds.): *Trade unions, immigration, and immigrants in Europe, 1960–1993. A comparative study of the attitudes and actions of trade unions in seven West European countries*, Oxford/New York 2000, pp. 39–64; John Wrench: *British Unions and Racism. Organizational Dilemmas in an Unsympathetic Climate*, in: *ibid.*, pp. 133–156.

66 Paul Teague: *Labour and Europe. The response of British trade unions to membership of the European Communities*, London School of Economics unpublished Ph.D. thesis 1984; *id.*: *The British TUC and the European Community*, in: *Millenium: Journal of International*

a long time but have recently started to address it in a systematic way.⁶⁷ British and German employer attitudes towards European integration have also been analysed in several studies.⁶⁸ In recent years, moreover, scholars have started to explore the post-1945 development of industrial relations in British and German subsidiaries of multinational firms⁶⁹ – even if much remains to be done in this area of study.

While encouraging signs are thus discernible, the literature suffers from a major flaw, namely that it has remained detached from mainstream national industrial relations historiography. The problem is, in other words, that the impact of transnationality on domestic industrial relations patterns has hardly been addressed.

The only exception in this regard is the Americanisation literature, which has not only looked at the attitudes of employer and trade unions towards US models and practices, but has also traced in detail the changes of domestic practices as a consequence of transatlantic encounters during the first two post-war decades.⁷⁰ In the German case, for example, the impact of US labour relations models has been shown to have contributed

Studies 18:1 (1989), pp. 29–46; for more recent reappraisals see Gerard Strange: British trade unions and European Union integration in the 1990s. Politics versus political economy, in: *Political Studies* 50:2 (2002), pp. 332–353; Philipp Whyman: British Trade Unions, the 1975 European Referendum and its Legacy, in: *Labor History* 49:1 (2008), pp. 23–46.

67 See in particular Jürgen Mittag (ed.): *Deutsche Gewerkschaften und europäische Integration im 20. Jahrhundert*, in: *Mitteilungsblatt des Instituts für soziale Bewegungen* 42 (2009).

68 See for example: Neil Rollings: British Industry and European Integration 1961–73. From First Application to Final Membership, in: *Business and Economic History* 27:2 (1998), pp. 444–453; Clemens Wurm: Verbände und europäische Integration. Großbritanniens Beitritt zur EG aus der Sicht von Industrie (CBI) und Gewerkschaften (TUC) 1969–1971, in: Franz Knipping/Matthias Schönwald (eds.): *Aufbruch zum Europa der zweiten Generation. Die europäische Einigung 1969–84*, Trier 2004, pp. 329–377; Werner Bühner: Le BDI (Bundesverband der deutschen Industrie) et les institutions européennes, in: Marie-Thérèse Bitsch (ed.): *Le couple France-Allemagne et les institutions européennes*, Bruxelles 2001, pp. 261–279; Wolfram Kaiser: Quo vadis, Europa? Die deutsche Wirtschaft und der gemeinsame Markt 1958–1963, in: Rudolf Hrbek/Volker Schwarz (eds.): *40 Jahre Römische Verträge. Der deutsche Beitrag*, Baden-Baden 1998, pp. 195–213.

69 See Bill Knox/Alan McKinlay: American Multinationals and British trade unions, c. 1945–1974, in: *Labor History* 51:2 (2010), pp. 173–192; Thomas Fetzer: Exporting the American model? Transatlantic entanglements of industrial relations at Opel and Ford Germany (1948–65), in: *ibid.*, pp. 211–232.

70 See for example: Steven Tolliday: Ford and Fordism in postwar Britain. Enterprise management and the control of labour 1937–1987, in: id./Jonathan Zeitlin (eds.): *The Power to Manage? Employers and industrial relations in comparative historical perspective*, London/New York 1991, pp. 81–114; Christoph Dartmann: Re-distribution of power. Joint consultation or productivity coalitions? Labour and postwar reconstruction in Germany and Britain 1945–1953, Bochum 1996.

to employers' post-1945 embrace of social partnership and trade unions' abandoning of radical ideas of planning and public ownership.⁷¹

The main future challenge for a "bottom-up" transnational history of post-1945 British and German industrial relations is to follow this example and explore more broadly the impact of various transnational entanglements on domestic industrial relations. There is no lack of potential topics. In the British case, for example, historians could engage more with the contemporary literature on foreign-owned firms' pioneering role in the spread of new industrial relations practices.⁷² More ambitiously, they could also systematically explore the transnational dimension of broader industrial relations reform debates since the 1960s, which have so far been studied through a purely domestic "lens".⁷³ In particular, historians should pay more attention to the role of discursive comparisons with foreign industrial relations practices – from the conflicts over the "import" of US labour law and German-style co-determination in the 1970s, to the battle over the UK's opt-out from EU-level industrial relations directives in the 1990s. In fact, following Howell's sweeping study of Britain's "three systems" of industrial relations, such an analysis could even be extended to cover major reform debates throughout the period since the late nineteenth century – already then, cross-national comparisons appear to have played an important role in making (or opposing) the case of reform.⁷⁴

In the German case, it is high time to systematically examine the transnational entanglements in the history of co-determination. Given the more centralised and legally regulated nature of German industrial relations, the "demonstration effects" of foreign-owned firms appear to be generally weaker than in the UK. Yet, they do exist – witness the recent work on the transformation of co-determination into "co-management" since the late 1980s.⁷⁵ At the same time, as in the British case, it would be worth exploring the broader discursive context, in particular with regard to the subliminal comparisons with foreign industrial relations systems for co-determination debates in the FRG, which were

71 See Jonathan S. Wiesen: *Coming to Terms with the Worker. West German Industry, Labour Relations and the Idea of America 1949–60*, in: *Journal of Contemporary History* 36:4 (2001), pp. 561–579; Julia Angster: *Konsenskapitalismus und Sozialdemokratie. Die Westernisierung von SPD und DGB*, München 2003.

72 See Anthony Ferner: *Foreign multinationals and industrial relations innovations in Britain*, in: Paul K. Edwards (ed.): *Industrial Relations: theory and practice*, 2nd ed., Oxford 2003, pp. 81–104.

73 See for example Alan Fox: *History and Heritage. The Social Origins of the British Industrial Relations System*, London 1985; Paul Davies/Mark Freedland: *Labour Legislation and Public Policy. A Contemporary History*, Oxford 1993.

74 Chris Howell: *Trade Unions and the State. The Construction of Industrial Relations Institutions in Britain 1890–2000*, Princeton 2005.

75 See for example Britta Rehder: *Betriebliche Bündnisse für Arbeit in Deutschland. Flächen-tarifvertrag und Mitbestimmung im Wandel*, Frankfurt a. M. 2003.

often connected to comparative assessments of bargaining and strike patterns.⁷⁶ That the emergence of a few small and militant occupational unions (e. g. train drivers) in the early 2000s has again triggered German employer anxiety about the “British disease” – a 1970s metaphor for chaotic and conflict-ridden industrial relations⁷⁷ – should be sufficient proof for the salience of this rhetoric in the post-1945 period. In the specific case of supervisory board co-determination, wider European entanglements also still await scholarly treatment, in particular with regard to the role of German actors and the “German model” in debates about board participation in other European countries and at the European Community/Union level.⁷⁸

It is not necessary to prolong this list of possible areas of inquiry because the general direction should by now be clearly discernible, namely, to repeat Trentmann’s verdict, that more efforts need to be made to treat domestic and international thought and policy as “interlocking spheres”. And, while a detailed literature assessment beyond the cases of Britain and Germany falls outside the scope of this review, it is not unlikely that this could prove useful for industrial relations historiography in other countries as well.

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76 See Andreas Hoff: “British Sickness” in Germany. An Inquiry into some international components of the current trade union debate in the Federal Republic of Germany, Unpublished M. A. Dissertation, University of Warwick 1977.

77 Gesamtmetall fürchtet britische Verhältnisse, in: Handelsblatt (17. August 2007).

78 For a first attempt see Thomas Fetzer: Defending Mitbestimmung. German trade unions and European company law harmonisation 1967–1990, in: *Economic and Industrial Democracy* 31:4 (2010), pp. 24–39.

